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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON
REORGANIZED DEBTORS' THIRD
OMNIBUS OBJECTION TO CLAIMS
(DUPLICATE CLAIMS)**

**Response Deadline:
September 8, 2020, 4:00 p.m. (PT)**

**Hearing Information If Timely Response
Made:**

Date: September 22, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **September 22, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable
7 Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended*
8 *General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020,
9 **the Omnibus Hearing will be conducted telephonically. The courtroom will be closed.** All parties
10 who wish to appear at the Omnibus Hearing must make arrangements to appear telephonically with
11 CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day before the Omnibus
Hearing. Further information regarding telephonic appearances via CourtCall can be found on the
Bankruptcy Court’s website, at the following location: www.canb.uscourts.gov > Rules and
Procedures > District Procedures > Policy and Procedure for Appearances by Telephone. Charges
have been waived by CourtCall for pro se parties.

12 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the
13 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Third Omnibus*
Objection to Claims, filed on August 13, 2020 [Dkt. No. 8753] (the “**Omnibus Objection**”).

14 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus
15 Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the
16 Reorganized Debtors at the above-referenced addresses so as to be received by no later than **4:00 p.m.**
17 **(Pacific Time) on September 8, 2020.** Any oppositions or responses must be filed and served as
18 described in the *Order Approving (A) Procedures for Filing Omnibus Objections to Claims and (B) the*
19 *Form and Manner of the Notice of Omnibus Objections*, entered on July 1, 2020 [Dkt No. 8228] (the
20 “**Omnibus Objections Procedures Order**”). **Any relief requested in the Omnibus Objection may**
be granted without a hearing if no opposition is timely filed and served in accordance with the
Omnibus Objections Procedures Order. In deciding the Omnibus Objection, the Court may
consider any other document filed in these Chapter 11 Cases and related Adversary Proceedings.

21 **PLEASE TAKE FURTHER NOTICE** that a customized Third Omnibus Claim Objection
22 Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the parties to
whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

23 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its
24 supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at
25 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
26 Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims
27 agent, Prime Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll
free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
28 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

1 Dated: August 13, 2020

KELLER BENVENUTTI KIM LLP

2 /s/ Peter J. Benvenutti

3 Peter J. Benvenutti

4 *Attorneys for Debtors and Reorganized Debtors*

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Exhibit A
Third Omnibus Claim Objection Notice

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7 *Attorneys for Debtors and Reorganized Debtors*

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS “OBJECTED-TO” ON THE FOLLOWING PAGE OF THIS NOTICE. IT DOES NOT SEEK TO DISALLOW YOUR “SURVIVING CLAIM.”

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric Company
25 ☒ Affects both Debtors

26 ** All papers shall be filed in the Lead Case, No.*
27 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF THE REORGANIZED DEBTORS’ THIRD OMNIBUS OBJECTION TO CLAIMS (DUPLICATE CLAIMS)

Response Deadline:
September 8, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: September 22, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

[Claimant Name]

Objected-To Claim(s)					Basis for Objection	Surviving Claim	
Date	Claim #	Debtor	Classification	Amount		Claim #	Amount

On August 13, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *Third Omnibus Objection to Claims* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by September 8, 2020 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

September 22, 2020 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, **the Hearing will be conducted telephonically or by video conference. The courtroom will be closed.** All parties who wish to appear at the Hearing should refer to the Bankruptcy Court’s website, www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.

BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM: By the Omnibus Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined therein) listed above as “Objected-To Claim(s)” on the grounds that the designated Proof(s) of Claim was superseded by a subsequently filed proof of claim that expresses that intention on the face of or in the attachments to the later-filed Proof of Claim. The Reorganized Debtors are not objecting to the Surviving Claim at this time and your Surviving Claim will NOT be disallowed if the Omnibus Objection is upheld by the Bankruptcy Court, whether or not you file a Response to this Omnibus Objection or appear at the Hearing.

If you do **NOT** oppose the disallowance of your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a written Response to this Omnibus Objection and you do NOT need to appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be disallowed and the Surviving Claim will remain as a validly filed Proof of Claim. (The Surviving Claim may be the subject of a later objection; should that occur you will be given specific advance notice by mail of that future objection with information about how you can respond if you dispute it.)

FILING AND SERVICE OF RESPONSE: If you **DO** oppose the disallowance of your Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at the above-referenced email addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on September 8, 2020 (the “Response Deadline”)**: You must file the Response through the Court’s electronic case filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’ Counsel will occur automatically upon ECF filing; and no separate service of your Response is required. If you do NOT have access to the ECF system, service must be made by electronic mail to the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must arrange for the Response to be filed with the Court within two business days thereafter. If you do not have the ability to serve a Response electronically, the Response must be served by mail, express or some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial express service that will make actual delivery not more than two business days after the Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number, the number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

CONTENTS OF RESPONSE The Response must, at a minimum, include the following: (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response; (v) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any.

If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above, then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a later date. You will receive a separate notice of any such objection.

TO GET COPIES OF THE COMPLETE OBJECTION: Copies of the complete Omnibus Objection and the other pleadings and documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account required], (ii) for free by download from on the Reorganized Debtors’ approved notice and claim agent’s website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,

1 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
2 request a complete copy of the Omnibus Objection, including all Exhibits.

3 Dated: August 13, 2020

KELLER BENVENUTTI KIM LLP

/s/ Peter J. Benvenutti

Peter J. Benvenutti

Attorneys for Debtors and Reorganized Debtors